

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

TODD BRINKMEYER

Petitioner,

v.

WASHINGTON STATE LIQUOR AND  
CANNABIS BOARD,

Respondent.

Case No. 3:20-cv-05661-BHS

**SECOND DECLARATION OF TODD  
BRINKMEYER IN SUPPORT OF MOTION  
FOR PRELIMINARY INJUNCTION**

I, Todd Brinkmeyer, hereby declare and state as follows:

1. I am the petitioner in this action, over the age of eighteen, have personal knowledge of the matters contained in the Declaration, and am competent to testify thereto.

2. I was attracted to Washington State's cannabis industry because of how it operated under a legal system, and how the state committed to stop treating adult-use licensed marijuana like a criminal enterprise. It was important to me that the industry be legal before I participate in it, and the industry is legal under Washington State law. I would not have become a financier for Washington marijuana businesses or sought to obtain an equity interest in the Stores had I known the respondent would treat that licensed business conduct as criminal. I have no interest in supporting or engaging in criminal activity. That includes my commitment to comply with the laws of my home state, which I have done and will continue to do.

*Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.*

TS Binkley

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Todd Brinkmeyer

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SIGNED at Seattle, Washington this 28th day of August, 2020.

Brie Geffre, Legal Assistant